

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: CRISS LORENZO FLOWERS, : Case No. 17-52682
: Chapter 13
Debtor. : Judge C. Kathryn Preston

**RESPONSE OF DEBTOR CRISS LORENZO FLOWERS IN OPPOSITION TO
CHAPTER 13 TRUSTEE'S MOTION TO DISMISS THE CASE
(DOCUMENT NO. 44)**

Now comes Debtor CRISS LORENZO FLOWERS, by and through the undersigned attorney, and respectfully opposes the Motion to Dismiss the Case that has been filed by the CHAPTER 13 TRUSTEE.

The Debtor claims that he will resume making regular monthly Chapter 13 plan payments. Specifically, the Debtor has recently submitted a full Chapter 13 plan payment to the Chapter 13 Trustee.

WHEREFORE, the Debtor respectfully requests that the Motion to Dismiss the Case of the CHAPTER 13 TRUSTEE be denied, and for the granting of such other and further relief as may be deemed appropriate and equitable.

Dated: 04 January 2019

Respectfully submitted,

/s/ Mark Albert Herder

Mark Albert Herder (0061503)
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and accurate copy of the preceding Motion and was duly served this date on the following registered ECF participants, electronically through the Court's ECF system at the email address registered with the Court:

Asst. U.S. Trustee (Col) - via ECF

Frank M. Pees, Chapter 13 Trustee – via ECF

and on the following by **ordinary U.S. Mail** addressed to:

Criss Lorenzo Flowers, 1368 Smith Road, Columbus, OH 43207-1577

Dated: 04 January 2019

/s/ Mark Albert Herder

Mark Albert Herder (0061503)

Attorney for the Debtor

MARK ALBERT HERDER, LLC